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UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

AARON JAMES and TIFFANY JAMES,
Heirs and Proposed Personal Representatives
of the Estate of Zane James,

Plaintiffs,

vs.

CASEY DAVIES, and COTTONWOOD
HEIGHTS;

Defendants.

Case 2:19-cv-00341

**AFFIDAVIT
OF TIFFANY JAMES**

Judge Howard C. Nielson, Jr.
Magistrate Judge Dustin B. Pead

STATE OF UTAH)
) ss.
County of Utah)

1. My name is Tiffany James. I am a resident of Cottonwood Heights, Utah.

My address is 2881 East Palma Way, Cottonwood Heights, Utah 84121.

2. I am the mother of Zane Anthony James. My son, Zane, was shot on May 29, 2018 by Cottonwood Heights Police Department officer Casey Davies. Aaron James is my husband. Aaron and I are the Plaintiffs in a lawsuit (Case No. 2:19-cv-341) against Cottonwood Heights, Utah and Cottonwood Heights Police Department (CHPD).

3. Aaron and I met, in person, with the Cottonwood Heights Mayor and City Manager at City Hall on November 12, 2018 to request that the City complete an internal investigation into our son's shooting death because we believed that additional information existed that was not provided to the District Attorney for his criminal investigation.

4. In that conversation with the Mayor and City Manager, we expressed our alarm that Officer Casey Davies was supposedly "off duty" at the time of the shooting and that he did not have a dashcam or bodycam operating when he shot our son.

5. We also expressed to them our concern that certain eyewitness testimony, that we knew to exist, may not have been provided to the District Attorney during his investigation of the shooting, because it was not included in the District Attorney's report of October 8, 2018.

6. The Mayor and City Manager indicated they were sorry they could not speak to us due to the potential for litigation and they further stated that their camera policy was not mandatory.

7. Aaron and I then requested records from the Cottonwood Heights Police Department regarding our son's shooting (Case 18X003056) as part of a GRAMA request dated November 13, 2018. We specifically requested all video associated with the case.

8. We received a response on December 11, 2018 that the processing of requested video was "in progress." Later, I was provided only video of the aftermath of the shooting.

9. We then, separately, asked the Mayor, the City Manager and the CHPD Police Chief for video of the shooting. My husband and I were told by each of them that neither Officer Davies nor Officer Betenson were wearing bodycam equipment at the time of the shooting. Further, they said Cottonwood Heights had no other video in their possession than what had been given to us as part of our GRAMA request.


10. I relied on these discussions with Cottonwood Heights officials as well as the information provided through our GRAMA request as being a true and complete explanation of the facts as we attempted to understand the full story surrounding our son's shooting death.

11. I forwarded the information we had been able to gather to our attorney who also relied upon that information as being a true and complete explanation.

12. On and around August 4, 2020, it was reported to me in multiple conversations with reliable individuals who are part of Cottonwood Heights government that, contrary to what I had been told, Cottonwood Heights was indeed in possession of camera footage of Zane's actual shooting by Officer Davies. These sources explained to me that they had seen the video and knew of multiple Cottonwood Heights personnel who had also seen the video.

13. At no time have I seen or been officially notified of the existence of this video, notwithstanding our GRAMA request in November 2018. Learning of the existence of this video was a total and complete surprise.

DATED this 11th day of August 2020.



TIFFANY JAMES, Affiant

Personally appeared before me this 11th day of August 2020, Tiffany James, signer of the foregoing instrument, who duly acknowledged to me that she executed the same.





Notary Public in and for the State of Utah